**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DIGI PORTAL LLC,	

DIGI PORTAL LLC,

                Plaintiff,

v.

QUOTIENT TECHNOLOGY INC.,

                Defendant.

C.A. NO. _____

JURY TRIAL DEMANDED

PATENT CASE

**ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT
AGAINST QUOTIENT TECHNOLOGY INC.**

Plaintiff Digi Portal LLC files this Original Complaint for Patent Infringement against Quotient Technology Inc., and would respectfully show the Court as follows:

I. THE PARTIES

1.   Plaintiff Digi Portal LLC ("Digi Portal" or "Plaintiff") is a Texas limited liability company with its principal place of business at 101 E. Park Blvd, Suite 600, Plano, Texas 75074.

2.   On information and belief, Defendant Quotient Technology Inc. ("Defendant") is a corporation organized and existing under the laws of Delaware, with a place of business at 400 Logue Avenue, Mountain View, CA 94043. Defendant has a registered agent at VCORP Services, LLC, 1013 Centre Road Suite 403-B, Wilmington, DE 19805.

II. JURISDICTION AND VENUE

3.   This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction of such action under 28 U.S.C. §§ 1331 and 1338(a).

4.   On information and belief, Defendant is subject to this Court's specific and general personal jurisdiction, pursuant to due process and the Delaware Long-Arm Statute, due at least to its business in this forum, including at least a portion of the infringements alleged

herein.   Furthermore, Defendant is subject to this Court's specific and general personal jurisdiction because Defendant is a Delaware corporation.

5.   Without limitation, on information and belief, within this state, Defendant has used the patented inventions thereby committing, and continuing to commit, acts of patent infringement alleged herein.   In addition, on information and belief, Defendant has derived revenues from its infringing acts occurring within Delaware.   Further, on information and belief, Defendant is subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and deriving substantial revenue from goods and services provided to persons or entities in Delaware.   Further, on information and belief, Defendant is subject to the Court's personal jurisdiction at least due to its sale of products and/or services within Delaware.   Defendant has committed such purposeful acts and/or transactions in Delaware such that it reasonably should know and expect that it could be haled into this Court as a consequence of such activity.

6.   Venue is proper in this district under 28 U.S.C. § 1400(b). On information and belief, Defendant is incorporated in Delaware.   On information and belief, from and within this District Defendant has committed at least a portion of the infringements at issue in this case.

7.   For these reasons, personal jurisdiction exists and venue is proper in this Court under 28 U.S.C. § 1400(b).

III.   COUNT I
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 8,352,854)

8.   Plaintiff incorporates the above paragraphs herein by reference.

9.   On January 8, 2013, United States Patent No. 8,352,854 ("the '854 Patent") was duly and legally issued by the United States Patent and Trademark Office.   The '854 Patent is

titled "Dynamic Page Generator." A true and correct copy of the '854 Patent is attached hereto as Exhibit A and incorporated herein by reference.

10.   Digi Portal is the assignee of all right, title and interest in the '854 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the '854 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the '854 Patent by Defendant.

11.   The application leading to the '854 patent is a continuation of U.S. application Ser. No. 11/656,636, filed Jan. 22, 2007, which is a continuation of U.S. application Ser. No. 09/393,718, filed Sep. 10, 1999, which is a continuation of U.S. application Ser. No. 08/873,975, filed Jun. 12, 1997. (Ex. A at cover). The '854 patent was first assigned to Yahoo! Inc.

12.   The invention in the '854 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:26-30).

13.   Web servers for serving static web pages were well known in the global Internet. (*Id.* at col. 1:31-32).   Such static web pages are useful in many applications whether the information presented to each requesting user is the same. (*Id.* at col. 1:32-34). However, some applications require customization to appeal to users. (*Id.* at col. 1:34-35). One example is presenting news to users. (*Id.* at col. 1:35-37). When static pages are used, a user will often have to scroll through many topics not of interest to that user to get to the information of interest. (*Id.* at col. 1:37-40). However, when presenting news to users, customized web pages present news that is more relevant to the requesting user than static pages because the information is filtered according to each user's interest. (*Id.* at col. 1:35-37, 40-41).

14.   Customizing a server response based on the requester is known; however, known systems do not scale well. (*Id.* at col. 1:42-43). One method of serving custom pages is to execute a script, such as a Common Gateway Interface (CGI) script or other program to collect the information necessary to generate the custom page. (*Id.* at col. 1:43-47). For example, if the custom page is a news page containing stock quotes, sports scores and weather, the script might poll a quote server to obtain the quotes of interest, poll a sports score server to obtain the scores of interest and poll a weather server to obtain the weather. (*Id.* at col. 1:47-51). With this information, the server generates the custom page and returns it to the user. (*Id.* at col. 1:51-52). This approach is only useful where there are not many requesters and where the attendant delay associated with polling various servers to obtain the requested information is acceptable to users. (*Id.* at col. 1:53-54). Growing impatience with waiting will turn users away from such servers, especially as use increases. (*Id.* at col. 1:54-58).

15.   One approach that was used in the prior art to avoid long waits is to transfer the custom information in non-real-time, so that the information is stored local to the user as it arrives and is presented to the user on request. (*Id.* at col. 1:59-62).   A disadvantage of such a system is that the networks used by the user become clogged with data continually streaming to the user and require large amounts of local storage. (*Id.* at col. 1:62-65). Another disadvantage is that the locally stored information will become out of date as the server receives new data. (*Id.* at col. 1:65-67).

16.   The inventors therefore recognized that there was a need to dynamically generate customized pages in an unconventional manner that solved the technical problems in the prior art of long transfer times to obtain the requested information or having to rely on continually

transferring custom information in non-real time which can clog the data network in addition to providing outdated information. (*Id.* at col. 1:42 to col. 2:2).

17. The following is a discussion of non-limiting examples of the claimed invention discussed in the specification of the '854 patent. The '854 patent provides a non-limiting exemplary diagram of the generation of a custom page for a user, using a front page generator (200) and page server (104) (*Id.* at col. 3:58-60):
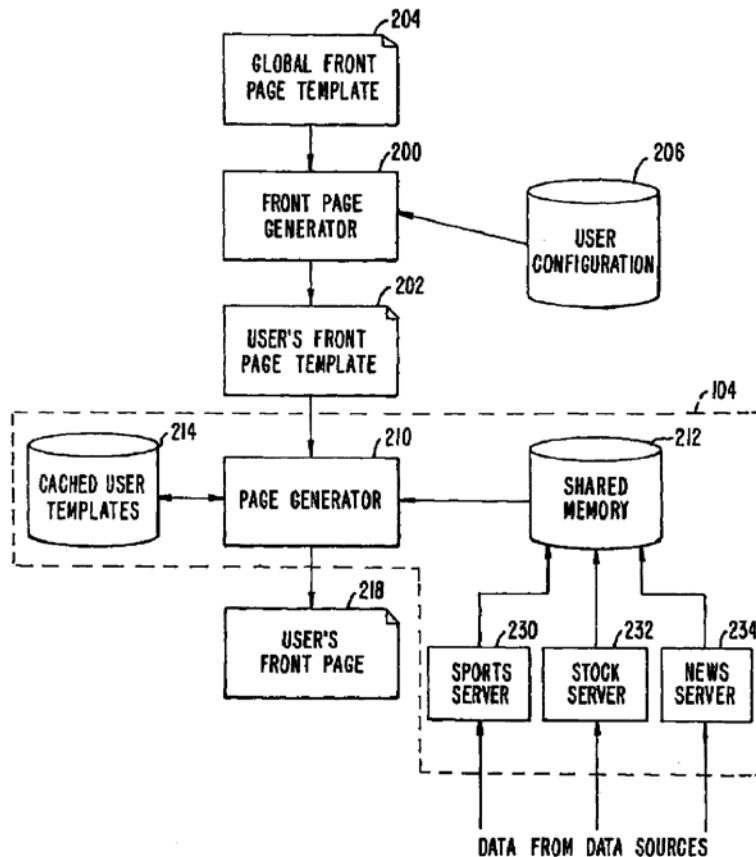
(Ex. A at Fig. 2). Front page generator (200) generates a user template (202) from a global front page template (204) and a user configuration record (206). (*Id.* at col. 3:58-62). A non-limiting example of a global front page template is provided in the '854 patent:

```
<html>
<head>
<title>My Yahoo! news summary for <!-- login --></title>
</head>
<body>

<center>
<!--banner:sum -->

<!-- ad -->
<!-- nav bar -->          ~ 302
</center>

<table border=1 cellpadding=4 cellspacing=0 width=100%">
<tr><td align=center valign=top width="1%">
<!-- leftside:nsum -->    ~302

<p></td>
<td align=center valign=top width="100%">
<!-- mode bar:"FRONT PAGE" -->
<!-- channel:nsum -->     ~302

</td></tr>
</table>

<center>
<table border=1 cellpadding=2 cellspacing=0 width=100%">
<!-- motd:motn.html -->
</table>
</center>
<!-- search -->

<!-- copyright:sum -->

</body>
</html>
```

204

(Ex. A at Fig. 3). The global user template (204) is an HTML (HyperText Markup Language) document with additional tags as placeholders for live data. (*Id.* at col. 5:16-19). Several place holders (302) are show in the code. (*Id.* at col. 5:19).

18.   A user configuration record (206) is a record selected from user configuration database (116). (*Id.* at col. 3:63-64). User configuration information includes user demographic information, such as sex, age, location, stock quotes, favorite sports teams, news topics, etc. (*Id.* at col. 2:13-14, col. 5:45-50, col. 6:37-39, 46-48, 52-56). The user configuration information in the example may not change until the user changes his or her preferences. (*Id.* at col. 5:33-35).

19.   The '854 patent provides an illustration of a user template (202) as might be generated from global user template (204) and a user configuration record (206):

6

202

```
<!-- timezone:-8,PT 0 -->
<!-- ad:M,85,95035,T,* 792 -->
<!-- portfolio:Quotes,pf_1,1,^DJI,^NYA,^IXIC,^SPX,^XAX,YHOO,NSCP,IOM,NSCP,YHOO
2836 -->
<!--
404  scoreboard:NCAAFSSC,NHLSAN,MLSSAN,NCAAFSSS,ALOAK,NBAGSW,NFLOAK,NCAAFCCD,NFLSFO
,NLSFO 3803 -->
<!-- weather:f,30901,uk_londo,94601,95101 4368 -->
<!--
mode_bar:"FRONT_PAGE",.hier=News+Summary%3aEdit&.done=http://my.yahoo.com/news
/summary2:3,rt,rw,z0000,mlb,re,vf 4597 -->
<!-- motd:us_motn.html 4696 -->
<html>
<head>
<title>My Yahoo! news summary for ash802</title>
</head>
<body>

...

</body>
</html>
```

(Ex. A at Fig. 4). The user template is unique because it is built based on user demographic information provided by the user, as opposed to generically chosen dynamic information or based on information provided by the server. Exemplary demographic information is shown in line 2 of Fig. 4 (":M,85,95035,T,*") indicating that the user is a male, age 85, located in zip code 95035, etc. (*Id.* at col. 5:42-45). The '854 patent includes a full listing of the non-limiting exemplary user template of Fig. 4 in Appendix A. (Ex. A at col. 2:57-58; col. 5:22-23).

Listing of a User Template

```
<!-- timezone: -8,PT 0 -->
<!-- ad:M,85,95035,T,* 792 -->
<!--
portfolio:Quotes,pf_1,1,^DJI,^NYA,^IXIC,^SPX,^XAX,YHOO,NSCP,IOM,NSCP,YHOO
2836 -->
<!--
scoreboard:NCAAFSSC,NHLSAN,MLSSAN,NCAAFSSS,ALOAK,NBAGSW,NFLOAK,NCAAFCCD,NF
LSFO,NLSFO 3803 -->
<!-- weather:f,30901,uk_londo,94601,95101 4368 - - >
<!--
mode_bar:"FRONT_PAGE1",.hier=News+Summary%3aEdit&.done=http://my.yahoo.com/
news/summary.html?v 4538 -->
<!-- summary2:3,rt,rw,z0000,mlb,re,vf 4597 -->
<!-- motd:us_motn.html 4696 -->
<html>
<head>
<title>My Yahoo!news summary for ash802</title>
</head>
<body>

<center>
<map name="top"><area shape=rect coords="0,0,45,66"
href="/news/summary.html?v"><area shape=rect coords="45,0,90,66"
href="/internet/directory.html?v"><area shape=rect coords="90,0,135,66"
href="/contacts/white_pages.html?v"><area shape=rect coords="135,0,346,66"
href="/?myHome"><area shape=rect coords="346,0,389,66"
href="/help/news/summary.html"><area shape=rect coords="389,0,431,66"
href="http://edit.my.yahoo.com/config/eval_profile"><area shape=rect
coords="431,0,477,66" href="http://edit.my.yahoo.com/config/toffly">
</map>
<center><a href="/bin/top_menu"><img border=0 height=62 width=477 ismap
usemap="#top" src="http://www.yahoo.com/images/my/banner/news1.gif"
alt="My Yahoo!"></a></center>

<p>
<center><form action="http://search.my.yahoo.com/search/my"> <font
size="-2">[ <a
href="http://edit.my.yahoo.com/config/set_attr?attr=sloc&value=b&.done=htt
p://my.yahoo.com/news/summary.html?v">move to bottom</a> ] </font><input
size=25 name=p> <font size="-1">  <input type=submit
value=Search><input type=hidden name=n value="25">   <a
href="http://search.my.yahoo.com/search/my/options">Options</a></font></fo
rm></center><p>
<center>
<table border=0 cellspacing=0 cellpadding=2>
<tr>
<td align=center><font
color="#000000"><b>Sections:</b>  </font></td>
<td align=center bgcolor="#dcdcdc"><font
color="#000000"><b>Front Page</b></font></td>
<td> | </td>
<td align=center><a href="/news/business/summary.html?v">Business</a></td>
<td> | </td>
<td align=center><a
href="/news/portfolio_summary.html?v">Portfolios</a></td>
<td> | </td>
<td align=center><a
href="/news/entertainment/summary.html?v">Entertainment</a></td>
<td> | </td>
<td align=center><a href="/news/sports/summary.html?v">Sports</a></td>
<td> | </td>
<td align=center><a
href="/news/technology/summary.html?v">Technology</a></td>
</tr>
</table>
</center>
</center>
<table border=1 cellpadding=4 cellspacing=0 width="100%">
<tr><td align=center valign=top width="1%">
<a
href="http://edit.my.yahoo.com/config/eval_left?mode=left_nsum&.done=http%
3a%2f%2fmy%2eyahoo%2ecom%2fnews%2fsummary%2ehtml%3fv"><img border=0
src="http://www.yahoo.com/images/my/left.gif"alt="edit left"></a>
<table border=0 cellpadding=1 cellspacing=0 width="100%">
<tr bgcolor="#dcdcdc"><td colspan=4 width="100%"><table border=0
cellpadding=2 cellspacing=0 width="100%"><tr><td width="100%"><b><font
size="+1">P<font size="+0">ORTFOLIOS</font></font></b></td><td
```

8

```
align=right><a
href="http://edit.my.yahoo.com/config/eval_quotes?.done=http://my.yahoo.co
m/news/summary.html?v"><img align=absmiddle border=0 height=13 width=25
src="http://www.yahoo.com/images/my/personalize.gif"
alt="edit"></a></td></tr></table></td></tr>
<tr><td align=center colspan=4><form method=get
action="http://quote.yahoo.com/quotes"><font size="-1"><input type=text
size=10 name=symbols><input type=submit value="Get Quotes"><br><font
size="0">quotes delayed 20 minutes – <a
href="/fin_disclaimer.html">disclaimer</a><br>click on symbol for detailed
quote + news<br><b>*</b> indicates new news during last
24hrs<font></form></td></tr></table>
<hr size=0><table border=0 cellpadding=1 cellspacing=0 width="100%">
<tr bgcolor="#dcdcdc"><td colspan=5 width="100%"><table border=0
cellpadding=2 cellspacing=0 width="100%"><tr><td width="100%"><a
href="/sum/?http://sports.yahoo.com/"><b><font size="+1">S<font
size="+0">COREBOARD</font></font></b></a></td><td align=right><a
href="http://edit.my.yaho9.com/config/set_sports?.done=http://my.yahoo.com
/news/summary.html?y"><img align=absmiddle border=0 height=13 width=25
src="http://www.yahoo.com/images/my/personalize.gif"
alt="edit"></a></td></tr></table></td></tr>

<hr size=0><table border=0 cellpadding=2 cellspacing=0 width="100%">
<tr bgcolor="#dcdcdc"><td colspan=3 width="100%"><table border=0
cellpadding=2 cellspacing=0 width="100%"><tr><td width="100%"><a
href="/my/?http://weather.yahoo.com/"><b><font size="+1">W<font
size="+0">EATHER</font></font></b></a></td><td align=right><a
href="http://edit.my.yahoo.com/config/set_wni?.done=http://my.yahoo.com/ne
ws/summary.html?v"><img align=absmiddle border=0 height=13 width=25
src="http://www.yahoo.com/images/my/personalize.gif"
alt="edit"></a></td></tr></table></td></tr>
<tr><td align=center colspan=3><font size=0>click on city for extended
forecast</font></td></tr>
</table>

<hr size=0>
<p></td>
<td align=center valign=top width="100%">

<table border=1 cellpadding=2 cellspacing=0 width="100%">
</table>

</td></tr>
</table>

<center>
<table border=1 cellpadding=2 cellspacing=0 width="100%">

</table>
</center>

<p>
<hr>
<center>
<table border=0 cellpadding=0 cellspacing=0 width="100%">
<tr>
<td align=left valign=top><tabie border=0 cellpadding=0 cellspacing=0>
<tr><td align=left valign=bottom><a href="/my/?http://www.yahoo.com/"><img
border=0 height=47 width=47 src="http://www.yahoo.com/images/my/yahoo.gif"
alt="Yahoo!"></a></td>
<td>   </td>
<td align=left valign=bottom width="100%"><font size="-1"><i>Copyright
&copy; 1994–1997 Yahoo! Inc. All rights reserved.</i><br>Portions
copyright &copy; 1997 Reuters Ltd. All rights reserved.<br>
Portions copyright &copy; 1997 SportsTicker Enterprises LP. All rights
reserved.<br>
Portions copyright &copy; 1997 Weathernews Inc. All rights reserved.<br>
Portions copyright &copy; 1997 Business Wire. All rights reserved.<br>
Portions copyright &copy; 1997 PR Newswire. All rights reserved.<br>
Questions, comments, or suggestions? Send us <a
href="http://my.yahoo.com/feedback.html">feedback</a>.</font></td>
</tr>
</table>
</tp>
<td>   </td>
<td align=right><a href="/bin/logout_menu"><img border=0 height=68
width=100 ismap usemap="#logout"
```

```
src="http://www.yahoo.com/images/my/logout.gif" alt="Change
User"></a></td>
</tr>
</table>
</center>
<map name=logout>
<area coords="0,0,50,68" href="/my/?http://www.yahoo.com/">
<area coords="51,0,100,68"
href="http://edit.my.yahoo.com/config/login?logout=1">
</map>

</body>
</html>
```

(Ex. B at Col. 7-11).

20.   As shown in Fig. 2 of the '854 patent, the user template does not need to be generated each time and instead can be generated and stored. (Ex. A at col. 4:49-51, col. 5:23-32). One benefit of the claimed invention that speeds up the operation of the dynamic page generation is that the page can be stored in multiple locations that are based on the frequency by which the user requests the customized page based on the user template. (*Id.* at col. 5:37-38, col. 6:49-59). Some users might choose to access their user page infrequently, while others might choose to access their front page hourly. (*Id.* at col. 6: 52-54). For infrequent users, the user template is stored in a user configuration database, whereas for frequent users the user template may also be stored in cache. (*Id.* at col. 5:37-38, col. 6:51-59). Caching reduces the time to respond to a request for a page and is more effective where the typical user makes several requests in a short time span and then doesn't make any requests for a long period of time. (*Id.* at col. 5:29-32).

21.   When the user template stored in cache, it may be stored long enough to be reused and may also be flushed from cache if the user page has been inactive for several days. (*Id.* at col. 6:49-52, 59-60). Even if it is flushed from cache, the user template can be maintained in the user configuration database, which can then be quickly accessed and stored in cache in the event a user may start to access the user page quickly. (*Id.*).

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22.   The custom user page can also include an advertisement that is selected based on the user demographic information. (*Id.* at col. 5:39-42). For example, using the demographic information ":M,85,95035,T,*", an advertisement can be selected that is targeted for a male user, age 85, located in zip code 95035, etc. (*Id.* at col. 5:39-45).

23.   Appendix B of the '854 patent is an HTML source code listing of an HTML page created from an executed user template that is used to generate a user customized browser web page. (Ex. B at col. 11 – col. 19).

24.   As explained the '854 patent and prosecution history, there are unconventional and non-generic features of the claimed invention which are technical improvements that make the generation of dynamic web pages quicker, more efficient, and use less resources. By storing the user customized template program in two locations in which the location is determined by frequency, the system is more efficient and allows for a quicker response than the prior art. For example, by storing the user customized template in user configuration database and in cache, the dynamic generation of a user customized web page is more efficient and uses less resources of the server, database, and network, and allows for a quicker generation of the dynamic web page thereby allowing the server to scale in order to handle substantially more requests for user customized dynamic web pages. (*See* Ex. A at col. 1:42-67, col. 4:49-col. 5:15, col. 5:23-32). Furthermore, by caching the user template, the page can be generated entirely within a page server, thus conserving network and database resources. (*See id.* at col. 4:10-11, col. 5:23-32). By also storing the user customized template in a user configuration database, even if the cache is cleared, the template already exists in the database which then prevents having to regenerate a new user customized page from a global page template using a user configuration record thus saving database and server resources and more quickly generating the requested web page from
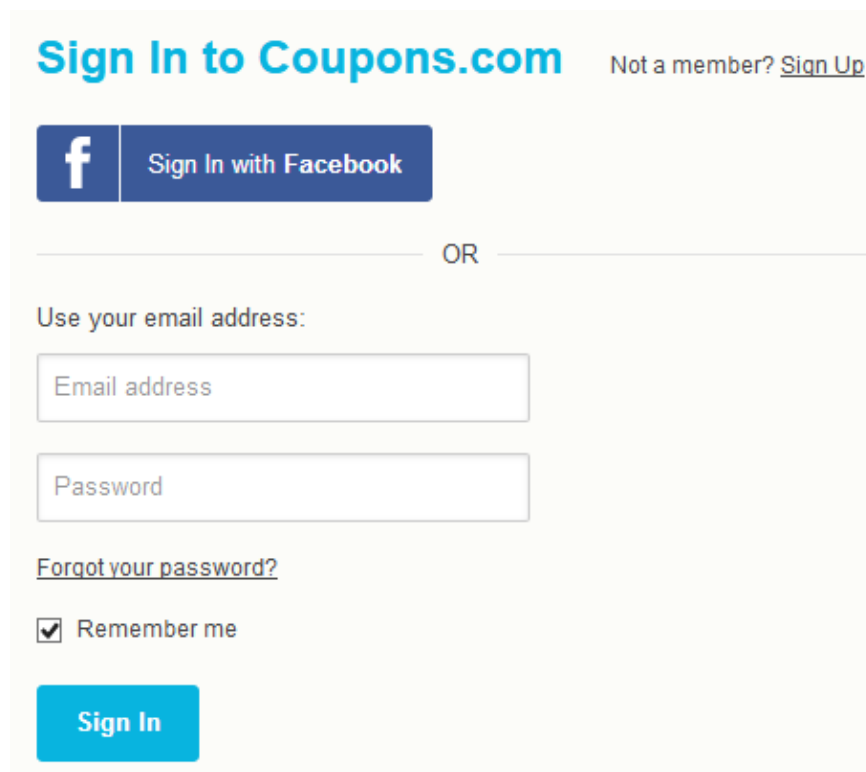
the user customized template. (*E.g.*, *id.* at col. 3:37-39, col. 4:1-11, 49-62). The storage of a user customized template program in at least two locations and the location determined from the frequency of the user request for the customized page was an unconventional and non-generic method for storing such templates and was not disclosed in the prior art. (Resp. to Office Action Oct. 28, 2010 at 9).

26.   Furthermore, the invention provides for more personalized web pages because the user provides user configuration information on which the user customized template is generated. (Ex. C (Oct. 28, 2010 Resp. to Office Action) at 9; Ex. D (Apr. 18, 2011 Resp. to Office Action) at 6). This was an unconventional way for generating a user customized template unique to the user that was not found in the prior art. (Ex. D (Apr. 18, 2011 Resp. to Office Action) at 6).

26.   The patents related to the '854 patent and sharing the same specification were cited during the prosecution history of over 700 patents, including patents and applications owned by companies including Google, Inc., Microsoft Corporation, Amazon Technologies, Inc., Facebook, Inc., Ebay, Inc., Salesforce.com, Inc., IBM Corporation, Oracle International Corporation, Comcast Cable Communications, LLC, SAP AG, Citrix Systems, Inc., BEA Systems, Inc., Sprint Communications Company L.P., Siemens AG, AT&T Intellectual Property I, L.P., Hewlett-Packard Development Company, L.P., Fujitsu Limited, AOL LLC, General Electric Company, Accenture LLP, Adobe Systems Inc., Sony Computer Entertainment Inc., and Akamai   Technologies,   Inc.   (*See*   http://patft.uspto.gov/netacgi/nph-Parser?Sect1=PTO2&Sect2=HITOFF&p=1&u=%2Fnetahtml%2FPTO%2Fsearch-bool.html&r=0&f=S&l=50&TERM1=5983227&FIELD1=UREF&co1=AND&TERM2=&FIELD2=&d=PTXT).

27. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claim 1 of the '854 patent in Delaware, and elsewhere in the United States, by performing actions comprising using or performing the claimed method of dynamically generating a customized page, including without limitation through the method implemented of generating a user's coupons.com page ("Accused Instrumentality").

28. The Accused Instrumentality performs the step of receiving a user request for a customized page. For example, coupons.com receives a user request for a user customized coupons page:

(*E.g.*, https://www.coupons.com/sign-in).
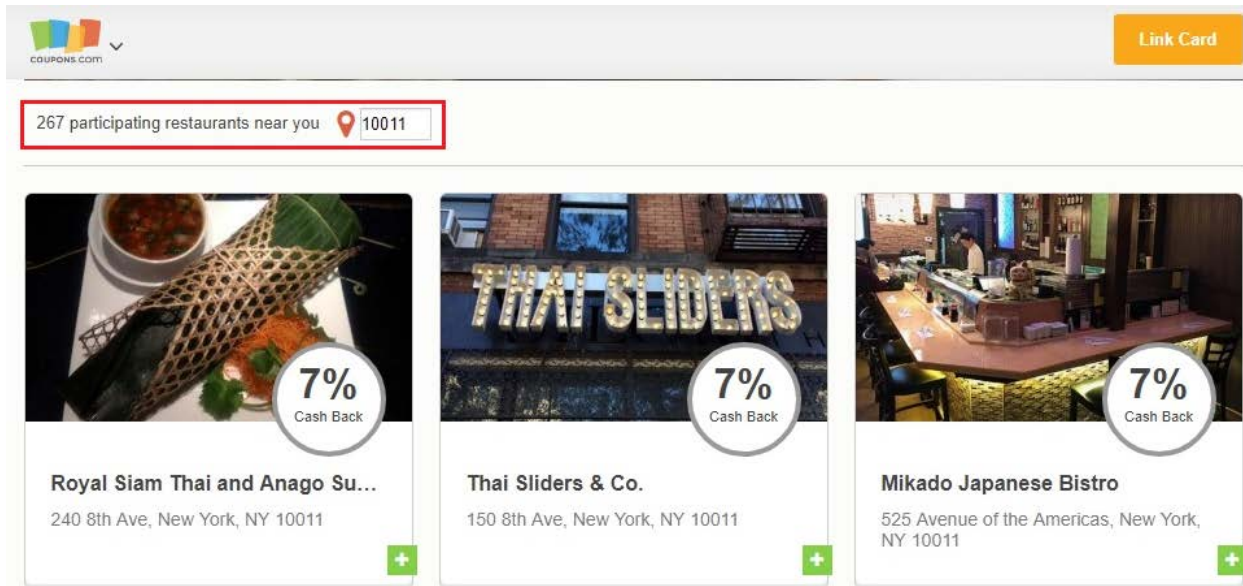
(https://www.coupons.com/card-linked-offers/ (for a particular user))

29.   The Accused Instrumentality performs the step of receiving a template program (*e.g.*, software instructions and data used for rendering a particular user's home page and Timeline) that is unique to the user and based on user configuration information (*e.g.*, a user can customize the content of their templates and what will be rendered and displayed using said templates by entering information such as their location) the user configuration information being supplied by the user (*e.g.*, a user defines the information their template will display by inputting information such as their location) and used to build the template program that is unique to the user (*e.g.*, user profile and user configuration information is used to modify templates, create instructions, and designate appropriate data retrieval for rendering the user's specific page).

(https://www.coupons.com/coupon-codes/categories/restaurants/ (for a particular user)).

(https://www.coupons.com/coupon-codes/#fav (for a particular user)).

(https://www.coupons.com/coupon-codes/#fav (for a particular user)).

(https://www.coupons.com/coupon-codes/#fav (for a particular user)).

16

30.   The user configuration information including user demographic information (*e.g.*, a user's profile information and/or configuration information may contain their name, address, and other information). (*E.g.*, https://www.quotient.com/privacy-policy/).

31.   For example, the following coupons.com user customized web page code demonstrates a template program that is unique to the user and based on user configuration information with the user configuration information (including user demographic information) being supplied by the user that is used to build the template program that is unique to the user:

```
      Coupons","pageSubTitleSingular":"{count} grocery coupon is available for you. Just \u003Cem\u003EClick,\u003C\/em\u003E \u003Cem\u003EPrint\u003C\/em\u00:
      and \u003Cem\u003ESave.\u003C\/em\u003E","pageSubTitlePlural":"{count} grocery coupons are available for you. Just \u003Cem\u003EClick,\u003C\/em\u003E
      \u003Cem\u003EPrint\u003C\/em\u003E and \u003Cem\u003ESave.\u003C\/em\u003E","pageLoading":"Loading","BackToHome":"See more printable
      offers"}},"printblock":false,"userstudy":{"experience":"lightbox","feedbackDialog":1},"locationinfo":{"popDialog":1,"sessionCount":"10"},"deferred":{"css
      {"default":["\/\/cdn.cpnscdn.com\/nv.web\/combo\/css\/79ffa58a6185df20802f7a48d39470e7.css"]},"js":{"default":
      ["\/\/cdn.cpnscdn.com\/nv.web\/combo\/js\/8b9570d93aladb9d0751c8b65f42c3a9.js"],"IE 8":
      ["\/\/cdn.cpnscdn.com\/nv.web\/combo\/js\/406623c84bce8125aa5994569459bd98.js"]}}}};
1905      </script>
1906
1907      <script type="text/javascript" src="//cdn.cpnscdn.com/nv.web/combo/js/dddldb1521a554ada3f123cd64086049.js"></script> <!--[if (lte IE 9)]> <script
      type="text/javascript" src="//cdn.cpnscdn.com/nv.web/combo/js/e199bca5e8af5684886af120f0be2872.js"></script><![endif]--><script type="text/javascript"
      src="//widgets.coupons.com/js/static/dust-core.js"></script>
1908  <script type="text/javascript" src="//widgets.coupons.com/js/static/couponscom-widget-v2.js"></script>    <div id="fb-root"></div>    <script
      src="//s.btstatic.com/tag.js" async="async">
1909      { site: APP_COUPONSINC.contextData.brighttag.siteid, host: "s.thebrighttag.com" }
1910  </script>
1911  <noscript>
1912      <iframe src="//s.thebrighttag.com/iframe?c=i54834M" width="1" height="1" frameborder="0" scrolling="no" marginheight="0" marginwidth="0"></iframe>
1913  </noscript>
```

(https://www.coupons.com/).

32.   The template program is received from one of at least two locations (*e.g.*, the data comprising a user's home page and Timeline may be retrieved from a main server/disk storage, or a cache CDN server), the location determined from the frequency of the user request for the customized Coupons page (*e.g.*, based on the frequency at which a user logs in to request access to their Coupons, the data comprising the user's Coupons page may be stored at a cache CDN server or a main server). On information and belief, the accused instrumentality utilizes Dust.js for JavaScript templating and delivers user templates from a main Dust/JSS/CSS server. However, if a user recently and/or frequently accesses their coupon page, the user template can instead be cached in a CDN Server.

33.   The Accused Instrumentality performs the step of receiving an advertisement selected in accordance to the user demographic information (e.g., Coupons.com provides advertisements to a user based on demographic information such as location, interests, activity).

(*E.g.*, https://www.quotient.com/privacy-policy/). For example, the accused instrumentality has targeted advertising to users based on a user's geography and interest. (*Id.*).

34.   The Accused Instrumentality performs the step of executing the template program (*e.g.*, JavaScript templates) using the selected advertisement (*e.g.*, an advertisement selected based on a user's demographic information) to generate the customized page (*e.g.*, a user's coupon page, with the advertisement integrated).   (*E.g.*, https://www.coupons.com/coupon-codes/categories/restaurants/ (for a particular user)).

35.   The Accused Instrumentality practices providing the customized page to the user (*e.g.*, a user's Coupons page with integrated advertisements)
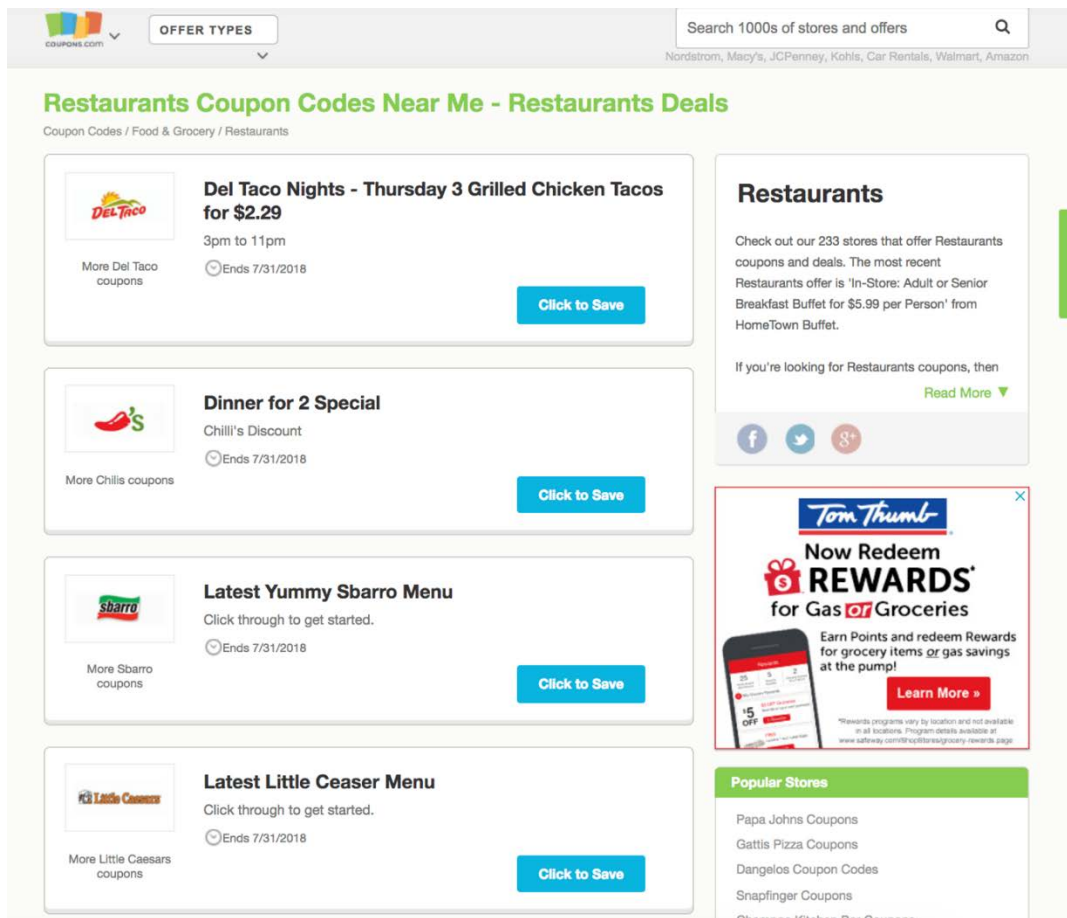
(https://www.coupons.com/coupon-codes/categories/restaurants/ (for a particular user)).

36.   Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '854 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

37.   On information and belief, Defendant has had at least constructive notice of the '854 patent by operation of law, and there are no marking requirements that have not been complied with.

IV. JURY DEMAND

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

a.   Judgment that one or more claims of United States Patent No. 8,352,854 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;

b.   Judgment that Defendant account for and pay to Plaintiff all damages to and costs incurred by Plaintiff because of Defendant's infringing activities and other conduct complained of herein;

c.   That Plaintiff be granted pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein; and

d.   That Plaintiff be granted such other and further relief as the Court may deem just and proper under the circumstances.

September 25, 2018   DEVLIN LAW FIRM LLC

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